

REMARKS

Reconsideration and allowance of the subject application are respectfully requested.

Claims 1-3, 5-16, 18-29 and 31-40 are all the claims pending in the application. In response to the Office Action, Applicant respectfully submits that the claims define patentable subject matter.

Claims 1-3, 5-16, 18-29, and 31-40 remain rejected under 35 U.S.C. § 103(a) as being unpatentable over Hedin et al. (U.S. Patent No. 6,185,535, hereafter "Hedin") in view of King (U.S. Patent No. 6,532,446) and newly cited D'hoore et al. (U.S. Patent No. 6,085,160, hereafter "D'hoore"). Applicant respectfully traverses the prior art rejections.

In the previous Office Action dated September 26, 2007, the Examiner conceded that Hedin and King do not teach or suggest "the voice data is translated to text using a voice print". The Examiner thus relied on D'hoore to allegedly cure that conceded deficiency.

In the Response filed on December 26, 2007, Applicant submitted that there is no teaching or suggestion in D'hoore that the voice print is used to translate voice data into text. Rather, D'hoore discloses that the voice print is used to determine the identity of the speaker of the speech input (column 2, lines 1-6). However, there is no teaching or suggestion in D'hoore that the voice print is used to translate voice data to text as required by the claims.

In response, the Examiner asserts:

Specifically, it is noted that D'hoore discloses that 'speech recognition system is restricted to mapping the speech onto language specific symbols', 'the system will automatically construct the best possible phoneme or model unit sequence to describe the word, based on the phoneme model database and the uttered speech', 'this sequence is referred to as a voice print' that 'can be used to recognize

utterances of the trained word by the speaker', and 'it can **also** be used to check or detect the identity of the speaker' (D'hoore: col. 7, lines 32-55), which clearly indicates that D'hoore teaches using voice print not only for identifying speaker as admitted by the applicant but also for speech recognition (i.e. translating voice data to speech) as rejected by examiner.¹

Applicant respectfully disagrees with the Examiner's position. D'hoore discloses a language dependent speech recognition system which receives input speech and produces a speech-related signal representative of the input speech (column 1, lines 41-53). Acoustic models may be created using speech data from a plurality of languages. Words in a vocabulary of recognizable words may be described by a voice print comprised of a user-trained sequence of acoustic models from a database (column 2, lines 1-6). The voice prints may be used to recognize the utterances of trained word by the speaker, and may be used to check the identity of the speaker, since the voice print will better match the speech of the targeted speaker than the speech of another speaker (column 7, lines 46-55).

However, contrary to the assertions of the Examiner, there is no teaching or suggestion in D'hoore that the voice print is used to translate voice data into text. D'hoore appears to use the voice prints in order to obtain the proper enunciations or pronunciations of the words in the specific language of the user. D'hoore does not use the voice print to translate voice data to text as required by the claims.

¹ Page 4 of the Office Action dated March 26, 2008.

Further, Applicant respectfully submits that there is no teaching or suggestion in the cited references that the voice print is retrieved from a datastore based on the device identifier as recited in amended claims 1, 14, and 27

Accordingly, Applicant respectfully submits that independent claims 1, 14, and 27 should be allowable because the cited references do not teach or suggest all of the features of the claims. Claims 2, 3, 5-13, 15, 16, 18-27, 28, 29, and 31-40 should also be allowable at least by virtue of their dependency on independent claims 1, 14, and 27.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

/Mark E. Wallerson/

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON DC SUGHRUE/142133

46159

CUSTOMER NUMBER

Mark E. Wallerson
Registration No. 59,043

Date: May 1, 2008